

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHWESTERN DIVISION**

EVERETT SHIELDS,)
)
)
Plaintiff)
v.)
)
PILGRIM'S PRIDE)
CORPORATION,)
)
Defendant.)
)

CASE NO: 3:17-CV-00515-HGD

CONSENT PROTECTIVE ORDER

The parties hereto having consented through their respective attorneys to the entry of this Protective Order in order to protect the confidentiality of certain information and to facilitate discovery, IT IS HEREBY ORDERED THAT:

1. This Order shall govern all documents produced by Plaintiff and Pilgrim's Pride Corporation, in this action. Furthermore, this Order shall govern all information derived from such documents and copies, excerpts or summaries thereof.
2. The following documents shall be designated as confidential:
 - (a) Plaintiff's federal and state income tax returns;
 - (b) Plaintiff's medical records;
 - (c) any document from the personnel, employment, medical or payroll file of any employee or former employee of Defendant,

including, but not limited to, wage and salary information and other compensation documents; and

- (d) any other documents which a party in good faith designates as "confidential."

3. Such confidential documents shall be used solely for the purpose of this action, shall not be used for any other business, competitive or other purpose and shall not be disclosed to any other person or third party other than:

- (a) Counsel for the parties in the above-styled action, including employees of such counsel to the extent necessary to render professional services in the above-entitled action;
- (b) Plaintiff, but only as set out in paragraph 4 below;
- (c) The Court, persons employed by the Court working on this litigation, and jurors or prospective jurors;
- (d) Court reporters at the proceedings in this action;
- (e) Experts or consultants retained or consulted by the parties, but only as set out in paragraph 4 below; and
- (f) Deponents, trial witnesses, potential fact witnesses, and potential deposition witnesses, but only as set out in paragraph 4 below.

4. Prior to making such disclosure of any confidential documents or information pursuant to paragraph 3, counsel for the parties in this action shall inform any person to whom disclosure is being made that the information or documents, or any portions thereof, may only be used for the purpose set forth in this Protective Order. Additionally, each person to whom disclosure of confidential documents and information is permitted shall be shown a copy of this Order and shall be specifically advised by counsel that this Order applies to, and is binding upon such individual.

5. After the conclusion of this matter as to all parties, each confidential document shall be maintained by counsel under seal and shall not be disclosed to any other person or third party other than as is necessary for any issue arising from and concerning this litigation.

6. Nothing in this Order shall prevent a party from any use of his or her own confidential documents.

7. The inadvertent or unintentional disclosure of any confidential information, shall not be construed to be a waiver, in whole or part, of Plaintiff's or Defendant's claims of confidentiality, either as to the specific confidential information disclosed or as to other related information.

8. Before seeking relief from the Court due to an alleged violation of this Order, the party seeking relief will attempt to resolve the matter by agreement with the other party.

9. The terms of this Order are subject to modification, extension, or limitation as may be hereinafter agreed to by all parties, or by order of the Court.

AGREED AND ACCEPTED:

/s/ John I. Thomason
John I. Thomason
Attorney for Plaintiff

OF COUNSEL:

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/s/ Janell M. Ahnert
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